

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:23-cv-20304-RKA

ZAGG INC.,

Plaintiff,

v.

TX TRADING INC. et al.,

Defendants.

**DEFENDANT TX TRADING INC.'S UNOPPOSED MOTION TO RESCHEDULE
STATUS CONFERENCE AND FOR LEAVE TO APPEAR BY ZOOM**

Defendant, TX Trading, Inc. ("TX Trading"), by and through its undersigned counsel, hereby files this Motion to Reschedule Status Conference and for leave to appear by Zoom, as follows:

1. On March 28, 2023, the Court entered an Order setting an in-person Status Conference for Thursday, April 6, 2023 at 2:00 pm. DE-20.
2. April 6, 2023 is the first day of Passover. For religious reasons, Tx Trading respectfully requests that the Status Conference be reset for a date that is not a religious holiday.¹
3. Tx Trading requests leave to appear at the rescheduled Status Conference by Zoom as its counsel are located in Boca Raton and New York.

¹ The holiday is observed April 6-7 and 12-13.

4. Tx Trading further notes that the Court's Order Setting Trial and Pre-Trial Schedule set calendar call for Sunday, October 29, 2023. DE-19. Tx Trading requests that the calendar call be reset for a weekday.

5. Plaintiff does not oppose the relief sought in this motion.

WHEREFORE, Defendant, TX Trading, Inc., respectfully requests that the Court reset the Status Conference, allow counsel to appear by Zoom, reset Calendar Call to a weekday.

DATED: March 30, 2023
Boca Raton, Florida

Respectfully submitted,

CAHEN LAW, P.A.
1900 Glades Road, Suite 270
Boca Raton, Florida 33431
Tel. No.: (561) 922-0430

By: /s/ Geoffrey M. Cahen
Geoffrey M. Cahen
Florida Bar No. 0013319
Geoff@cahenlaw.com
Attorney for Defendants

LOCAL RULE 7.1(a)(3) CERTIFICATION

I certify that counsel for TX Trading conferred in good faith with counsel for Plaintiff prior to filing this motion and Plaintiff consents to the motion.

s/ Geoffrey M. Cahen
Geoffrey M. Cahen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed electronically, this **30th day of March, 2023**, to:

Counsel for Plaintiff

Mallory Meagan Cooney
K and L Gates
200 South Biscayne Boulevard
Suite 3900
Miami, FL 33131-2399
3055393342
Fax: 3053587095
Email: mallory.cooney@klgates.com

Jack S. Brodsky
K&L Gates, LLP
State Street Building
One Lincoln Street
Boston, MA 02110
(617) 261-3100
Email: jack.brodsky@klgates.com

Morgan T. Nickerson
K&L Gates LLP
State Street Financial Center, One Lincoln Street
Boston, MA 02111
617.261.3134
Email: morgan.nickerson@klgates.com

By: s/ Geoffrey M. Cahen
Geoffrey M. Cahen